1 2 3	EVE H. WAGNER (State Bar No. 126471) ANTHONY D. SBARDELLATI (State Bar No. 246431) SAUER & WAGNER LLP 1801 Century Park East, Suite 1150 Los Angeles, California 90067 Tel: (310) 712-8100; Fax: (310) 712-8108 E-mail: ewagner@swattys.com; asbardellati@swattys.com		
4	, — <u>, —                                     </u>		
5	JEREMY FEIGELSON (of counsel) BRUCE P. KELLER (of counsel) DEBEVOISE & PLIMPTON LLP		
6 7	919 Third Avenue   New York, New York 10022		
8	Tel: (212) 909-600; Fax: Email: jfeigelson@debevoise.com; bpkeller@debevoise.com		
9	Attorneys for Defendant Prometheus Global Media, LLC		
10			
11	UNITED STATES DISTRICT COURT		
12	CENTRAL DISTRICT OF CALIFORNIA		
13		CASE NO. CV11-7560-VBF (MRW)	
14	PENSKE MEDIA CORPORATION,	) Hon. Valerie Baker Fairbank	
15	dba PMC, a Delaware corporation,		
16	Plaintiff,	SECOND STIPULATION TO EXTEND TIME TO	
17	v.	RESPOND TO INITIAL	
18	PROMETHEUS GLOBAL MEDIA, LLC, a Delaware limited liability	COMPLAINT	
19	company d/b/a hollywoodreporter.com; and DOES 1 through 10, inclusive,	[PROPOSED] ORDER	
20	Defendants.	LODGED CONCURRENTLY HEREWITH	
21			
22	Plaintiff Penske Media Corporation ("Penske") and Defendant Prometheus		
23	Global Media, LLC ("Prometheus") (collectively, the "Parties"), by and through		
24	their counsel, hereby stipulate as follows:		
25			
26	WHEREAS, Penske filed the Complaint for Copyright Infringement (the		
27	"Complaint") in the above captioned action on September 14, 2011;		
28	2 complaint ) in the too to captioned detion on deptendent 14, 2011,		

SECOND STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT

1	WHEREAS, Penske served Prometheus with the Complaint on September		
2	26, 2011;		
3			
4	WHEREAS, Prometheus' response to the Complaint was originally due on		
5	October 17, 2011, i.e., 21 days after the date of service;		
6			
7	WHEREAS, the Parties previously stipulated to a thirty (30) day extension		
8	of time for Prometheus to respond to the Complaint, extending that deadline to		
9	November 16, 2011;		
10			
11	WHEREAS, the Parties are currently engaging in settlement discussions and		
12	wish to avoid any unnecessary costs; and		
13			
14	WHEREAS, Penske and Prometheus have accordingly agreed that		
15	Prometheus should have an additional thirty (30) days to respond to the Complaint		
16			
17	IT IS HEREBY STIPULATED and agreed to by and among the Parties as		
18	follows:		
19			
20	The deadline for the filing and service of Prometheus' responsive pleading		
21	to the Complaint is extended from Wednesday, November 16, 2011 to Friday,		
22	December 16, 2011.		
23			
24	DATED: November 2, 2011 FREEDMAN & TAITELMAN, LLP		
25	Du /g/Pmyan I Eraadman		
26	By: <u>/s/ Bryan J. Freedman</u> Attorneys for Plaintiff PENSKE		
27	MEDIA CORPORATION		
28			

Case 2 11-cv-07560-VBF -MRW Document 8 Filed 11/02/11 Page 3 of 3 Page ID #:71